

# Merson Law, PLLC

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# Merson Law, PLLC

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May 15, 2024

**VIA PACER E-FILING**

Hon. Mary Kay Vyskocil, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Re: ***Does vs. United States of America, 1:24-cv-1071-MKV***

Dear Hon. Judge Vyskocil:

I am counsel for Plaintiffs in the above matter. On May 15, 2024, Plaintiffs Jane Does 1-12 filed a second motion to proceed anonymously with a Declaration from a psychiatrist in support of the application and addressed additional sensitive facts that were not addressed in the first motion. Some of those facts include a concern with child sex abuse imagery and pornography media being involved in this case, and it would be highly disturbing for their names to be publicly associated with this. There are several Jane Does who were minors at the time of the abuse and their families do not know of the abuse. Several Jane Does have families of their own including teenagers who may be ostracized if their mothers' names are made public to the world. There are family members who are unaware of the abuse and public exposure would cause mental damage to innocent non-parties.

I respectfully request that the Court issue an emergency stay of the case schedule or alternatively, an extension of time to file the Amended Complaint until thirty (30) days after the decision of the motion to proceed anonymously. Pursuant to Your Honor's Order dated April 30, 2024, Plaintiffs were Ordered to file an Amended Complaint suing in the names of the individual Plaintiffs on or before May 20, 2024. There is now a pending second motion to proceed anonymously while also an impending date to proceed in name. If the Complaint is filed with their names, emotional harm will be done to the sexual abuse victims.

I have conferred with opposing counsel on this matter, and they do not oppose the request for either an emergency stay or extension of time to file the Amended Complaint until thirty (30) days after the decision of the motion to proceed anonymously.

I can be reached at [jplotkin@mersonlaw.com](mailto:jplotkin@mersonlaw.com) or at (212) 603-9100 if Your Honor has any questions. I thank the Court for its attention to this matter.

Respectfully submitted,  
MERSON LAW, PLLC

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